

United States District Court

for the
Western District of New York

United States of America

v.

Case No. 24-MJ-4135

ANDRE L. JONES,

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about November 14, 2024, in the County of Monroe, in the Western District of New York, the defendant violated:

Code Section

18 U.S.C. § 2113(a)

Offense Description

Bank Robbery

This Criminal Complaint is based on these facts:

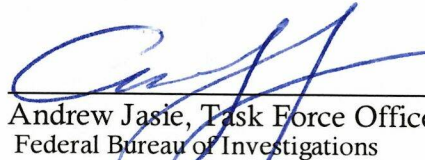
See attached affidavit.

☒ Continued on the attached sheet.

Affidavit and Criminal Complaint submitted electronically by email in .pdf format. Oath administered, and contents and signature, attested to me as true and accurate telephonically pursuant to Fed.R.Crim.P. 4.1 and 4(d) on:

Date: November 22, 2024

City and State: Rochester, New York



Andrew Jasie, Task Force Officer
Federal Bureau of Investigations



HON. MARIAN W. PAYSON
UNITED STATES MAGISTRATE JUDGE

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

24-MJ- 4135

-v-

ANDRE L. JONES,

Defendant.

State of New York)
County of Monroe) SS:
City of Rochester)

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, **Andrew Jasie**, being duly sworn, depose and state that:

INTRODUCTION

1. I am a Task Force Officer with the Federal Bureau of Investigation (FBI) assigned to the Rochester, New York Resident Agency. I have been assigned as a Task Force Officer with the FBI since December of 2014. I have been employed by the New York State Police for over twenty-five years and assigned as an Investigator for over twenty years. As part of my professional experience, I have participated in investigations involving gangs, bank robberies, Hobbs Act robberies, fugitives, and illegal drug trafficking. As an FBI Task Force Officer, I am charged with the duty of investigating violations of the laws of the United States, collecting evidence in cases in which the United States is or may be a party in interest, and performing other duties imposed by law.

2. This affidavit is submitted in support of a criminal complaint charging ANDRE

LAVERN JONES for a violation of Title 18, United States Code, Section 2113(a) (bank robbery), committed on or about November 14, 2024. The FBI Rochester Area Major Crimes Task Force (RAMCTF), in conjunction with local law enforcement authorities, has been investigating the November 14, 2024, bank robbery that occurred at the Key Bank located at 1185 University Avenue, Rochester, New York, in the Western District of New York. Through that investigation, ANDRE LAVERN JONES, was identified as a suspect. JONES' involvement in this robbery is further detailed herein.

3. I am fully familiar with the facts set forth herein based on my own investigative efforts, conversations with other law enforcement officers, and review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not included each and every fact I know concerning this investigation. Rather, I have set forth only those facts that relate to the issue of whether probable cause exists to believe the defendant committed the above-mentioned offense. Where statements of others are related herein, they are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. Where I assert that an event occurred at a particular time, I am asserting that it took place at or about that time. Furthermore, explanations in parentheses are based upon my knowledge and experience, the knowledge, training, and experience of law enforcement agents and officers with whom I have spoken, and the results of the investigation to date. Based on the facts set forth below, there is probable cause to believe that on or about November 14, 2024, in the County of Monroe, Western District of New York, ANDRE LAVERN JONES violated Title 18, United States Code, Section 2113(a) (bank robbery). In support thereof, I respectfully state the following:

PROBABLE CAUSE

4. On or about November 14, 2024, shortly before 1:25 PM, the Key Bank located at 1185 University Avenue, Rochester, New York was robbed by an unknown individual. Members of the Rochester Police Department (RPD) and the RAMCTF responded to investigate the robbery. The investigation revealed that on this date a black male suspect entered the bank and approached the teller counter. According to the victim-teller, the suspect approached the teller counter and asked to make a withdrawal. When the teller asked for the suspect's identification, instead of producing an identification, he passed a demand note across the counter. The demand note, written on what appears to be a torn piece of a Regional Transit Service (RTS) Bus Map, read: "QUICK & QUIET; \$10,000; 100's AND 50's; NO GPS OR DYE; PACKS" (note ';'s were added to represent line breaks and most of the letters appeared capitalized unless otherwise represented above). The victim-teller complied with the demand and provided the suspect a quantity of cash. The suspect further told the teller to get money from a second drawer, and she did. After obtaining the money, the suspect fled the bank. The suspect was described as a black male, approximately 5'6 in height, 150 lbs, brown eyes, wearing a grey knit cap with a Carhartt label, dark leather jacket, grey pants, and white surgical mask.

5. Investigators later determined from Key Bank officials that the suspect had obtained \$6,010 in United States currency.

6. Security camera footage from the bank further revealed that the suspect's grey, knit Carhartt cap had the following white writing on the front "Yukon-Kuskokwim Health

Corporation” underneath a white logo that appeared to show three busts above an arced white line.

7. Security camera footage from the bank also showed that the suspect carried what appeared to be a black violin case in and out of the bank. Underneath the black leather jacket, the suspect appeared to be wearing a large white shirt that hung out the bottom of the jacket. He wore light gray sneakers with white trim around the soles.

8. Investigators began looking for security cameras in the area to try to ascertain the suspect’s route of travel. As a result, the suspect was observed on cameras in the area of the robbery:

- At approximately 1:08 PM, several minutes prior to the robbery, the suspect was seen riding a turquoise bicycle eastbound on University Avenue, in the direction of Key Bank, wearing a gray knit cap, dark leather jacket, grey pants, light gray sneakers with white trim around the soles, and carrying a violin case.
- At approximately 1:13 PM, shortly before the robbery, the suspect was seen riding the turquoise bicycle eastbound on University Avenue, in the direction of Key Bank, wearing a gray knit cap, dark leather jacket, grey pants, light gray sneakers with white trim around the soles and carrying the violin case. Suspect was seen turning off University Avenue southbound on Oliver Street and disappeared off camera. A short time later, at approximately 1:16 PM, the suspect appeared on foot, in the same clothing, and carrying the violin case, but without the bicycle. He continued eastbound on University Avenue before disappearing off camera.

- The suspect was then observed walking eastbound on University Avenue towards the Key Bank, and disappeared from view headed in the direction of the Key Bank entrance, located on the south side of the Key Bank building. A short time later, the suspect was then observed walking westbound on University Avenue, traveling away from the Key Bank. Review of security camera footage from inside the bank revealed that the suspect was inside of the Key Bank building for approximately three minutes.
- At approximately 1:22 PM, the suspect, still wearing the gray knit cap, dark leather jacket, grey pants, light gray sneakers with white trim around the soles and carrying the violin case appeared walking quickly westbound on University Avenue away from the bank. He was seen cutting through the grass of the apartment building located at the corner of University Avenue and Oliver Street, heading southbound on Oliver Street before disappearing off camera.
- At approximately 1:35 PM, the suspect was observed riding the turquoise bicycle westbound on Park Avenue past Goodman Street. At this time the suspect was no longer wearing the black leather jacket nor the sweatpants. The suspect no longer appeared to be carrying the violin case and had a white and black duffel bag on his back. He was seen wearing a royal blue sweatshirt, and light blue jeans. A large white shirt was visible hanging out from underneath the blue sweatshirt appearing to be the same as the one underneath the black leather jacket observed at the time of the robbery. The shoes appeared to be the same gray shoes with white trim around the soles worn at the time of the robbery.

- At approximately 1:36 PM, the suspect was seen riding the turquoise bicycle westbound on Park Avenue past Meigs Street.

9. On November 15, 2024, the day after the robbery, investigators searched the area of Oliver Street just south of University Avenue, where the suspect was seen disappearing off the security camera footage, as described above. Investigators found an open violin case and pair of gray sweatpants tucked into a large bush at the edge of a small U-shaped open courtyard of an apartment building, located on the corner of University Avenue and Oliver Street at 94 Oliver Street. The location was very near, approximately 10-20 yards, from where suspect was last observed on the camera footage from 1100 University Avenue.

10. Shortly after 1:00 PM on November 15, 2024, an RPD officer, who had responded to the bank robbery and was familiar with the investigation, observed an individual matching the description of the suspect in the area of 500 South Avenue. A review of a surveillance camera located at South Avenue and Alexander Street in Rochester, New York, showed the individual walk toward the entrance of a high rise apartment building located at 500 South Avenue, Rochester New York.

11. Security cameras located at 500 South Avenue showed an individual entering 500 South Avenue at approximately 1:20 PM on November 15, 2024. The individual appeared to match the description of the suspect of the robbery. Further review of the cameras located at 500 South Avenue showed the same individual departing 500 South Avenue at approximately 11:09 AM on November 14, 2024, approximately two hours before the robbery, wearing the same gray knit Yukon-Kuskokwim Health Corporation cap, leather jacket, and shoes as the suspect was at the time of the robbery. Moreover, underneath the

jacket, he was wearing a royal blue Reebok sweatshirt, and light blue jeans, each appearing to match the sweatshirt and jeans observed on the suspect after the robbery riding the turquoise bicycle westbound on Park Avenue. He was not wearing a surgical mask at this time. The same individual was observed entering 500 South Avenue that afternoon, at approximately 2:30 PM, on foot pushing the turquoise bicycle. He was wearing a dark blue knit hat with orange trim, a royal blue Reebok sweatshirt, light blue jeans, grey sneakers with white trim around the soles, and carrying a duffle bag that appears to match the duffle bag observed on the suspect's back as he rode the turquoise bicycle westbound on Park Avenue at approximately 1:36 PM on November 14, 2024.

12. Review of security camera footage from 500 South Avenue led investigators to identify the suspect as ANDRE LAVERN JONES.

13. Records check revealed that JONES had been released from the Monroe County Jail on November 13, 2024, at approximately 8:08 PM. A review of security camera footage from the Monroe County Jail showed JONES departing the jail wearing the black leather jacket, gray sneakers with white trim around the soles, and gray knit cap with white markings consistent with the white emblem and writing of the "Yukon-Kuskokwim Health Corporation," all of which matched what the suspect wore at the time of the robbery. Additionally, underneath the black leather jacket he was wearing the royal blue Reebok sweatshirt and light blue jeans consistent with what the suspect was observed wearing 20 minutes after the robbery riding the turquoise bicycle westbound on Park Avenue. Furthermore, the clothing JONES was observed wearing as he departed the Monroe County Jail appeared to exactly match the clothes he was observed wearing at 500 South Avenue on

November 14, 2024, approximately two hours prior to the robbery.

14. At approximately 8:34 AM on November 19, 2024, JONES was observed departing 500 South Avenue with the turquoise bicycle matching the bicycle used by the suspect prior to and after the robbery.

15. Shortly before 2:00 PM, JONES was observed entering 500 South Avenue with the turquoise bicycle.

16. A review of security camera footage from 500 South Avenue showed JONES holding a stack of US Currency as he rode the elevator. Eventually he was observed via security camera footage entering the apartment 13L, located on the 13th floor. The turquoise bicycle was left outside the apartment door.

17. Uniformed RPD officers knocked on the door of 13L and eventually JONES came to the door. He confirmed the bicycle was his, and was thereafter taken into custody.

18. A search incident to arrest revealed JONES had over \$1000 in US Currency on his person.

19. RPD obtained a search warrant for 500 South Avenue, Apartment 13L to search for additional evidence of the robbery. The execution of that search warrant resulted in the seizure of additional US Currency stacked together neatly, a light blue pair of jeans consistent with those JONES was observed wearing approximately two hours prior and 20 minutes after the robbery. The turquoise bicycle was also seized as evidence of the crime.

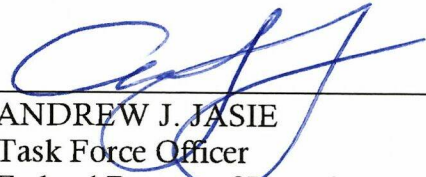
20. The total amount of US Currency recovered from JONES and inside apartment

13L was approximately \$1331.

21. At the time of the robbery on 14 November 2024, the Key Bank located at 1185 University Avenue, Rochester, New York, was a financial institution insured by the Federal Deposit Insurance Corporation (FDIC).

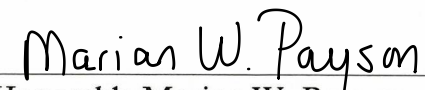
CONCLUSION

22. Based upon the above information, I submit there is probable cause to believe that on or about November 14, 2024, in the County of Monroe, Western District of New York, ANDRE LAVERN JONES violated Title 18, United States Code, Sections 2113(a) (bank robbery).



ANDREW J. JASIE
Task Force Officer
Federal Bureau of Investigation

Affidavit submitted electronically by email in .pdf format. Oath administered, and contents and signature, attested to me telephonically pursuant to Fed. R. Crim. P. 4.1 and 4 (d) on November 22, 2024.



Honorable Marian W. Payson
United States Magistrate Judge